

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

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GUOLIANG MA, ELIZABETH PEGUERO,  
SHARON MANIER, and KIN FAI LAU,  
on behalf of themselves and others similarly situated,

Plaintiffs,

Case No. 16-CV-7102

v.

HARMLESS HARVEST, INC.,

Defendant.

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**NOTICE OF PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY  
SETTLEMENT APPROVAL**

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 23(e), Plaintiffs GUOLIANG MA, ELIZABETH PEGUERO, SHARON MANIER, and KIN FAI LAU (collectively, "Plaintiffs"), on behalf of themselves and the proposed Class, will move this Court, on a date and time to be set by the Court, for an order (i) preliminarily approving the class settlement with Defendant HARMLESS HARVEST, INC. ("Harmless Harvest" or "Defendant"), (ii) preliminarily certifying the proposed Class, (iii) approving of the form and manner of the notice of the settlement, (iv) appointing settlement class counsel, (v) setting a final approval schedule for the settlement, and (vi) awarding such other relief as the Court may deem just and proper.

The reasons in support of this motion are fully set forth in the accompanying Memorandum of Law in Support of Plaintiffs' Unopposed Motion for Preliminary Settlement Approval and Declaration of C.K. Lee in Support of Plaintiffs' Unopposed Motion for Preliminary Settlement Approval. Plaintiffs have contemporaneously submitted a Proposed Order Granting Preliminary Settlement Approval, attached hereto as **Exhibit A**, for the Court's

convenience.

Dated: December 27, 2016  
New York, New York

Respectfully submitted,

By: /s/ C.K. Lee  
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